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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

FILED

SEP - 2 2020

CLERK, U.S. DISTRICT COURT

NO. 3:19-cr-00650-K

(Supersedes indictment filed

on December 18, 2019)

UNITED STATES OF AMERICA

V.

CURTIS VANCE MATHIS (1)
KENTION OBRYAN JOHNSON (2)
SERGIO TRINIDAD CARVAJAL (3)

SUPERSEDING INDICTMENT

The Grand Jury charges:

Count One

Sex Trafficking of Children

(Violation of 18 U.S.C. § 1591(a)(1))

Beginning in or about November 4, 2019, and continuing through in or about November 5, 2019, the exact dates being unknown, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Curtis Vance Mathis**, in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, namely, Jane Doe 1, who had not attained the age of 18 years, knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe Jane Doe 1, that Jane Doe 1 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. § 1591(a)(1), the penalty for which is found at 18 U.S.C. § 1591(b)(1) and (b)(2).

Count Two
Sex Trafficking of Children
(Violation of 18 U.S.C. § 1591(a)(1))

On or about November 5, 2019, in the Dallas Division of the Northern District of Texas, the defendants, **Kention Obryan Johnson** and **Sergio Trinidad Carvajal**, in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and/or solicit by any means a person, namely, Jane Doe 1, who had not attained the age of 18 years, knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe Jane Doe 1, that Jane Doe 1 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. § 1591(a)(1), the penalty for which is found at 18 U.S.C. § 1591(b)(1) and (b)(2).

Count Three

Conspiracy to Commit Sex Trafficking

(Violation of 18 U.S.C. § 1594(c) (18 U.S.C. § 1591(a)(1) and (a)(2))

Beginning in or about November 4, 2019, and continuing through in or about November 5, 2019, the exact dates being unknown, in the Dallas Division of the Northern District of Texas, the defendants, **Curtis Vance Mathis, Kention Obryan Johnson and Sergio Trinidad Carvajal**, along with others known and unknown to the grand jury, conspired and agreed with each other to knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and/or solicit by any means a person, namely, Jane Doe 1, who had not attained the age of 18 years, knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe Jane Doe 1, that Jane Doe 1 had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1) and (a)(2).

All in violation of 18 U.S.C. § 1594(c) (18 U.S.C. § 1591(a)(1) and (a)(2)).

Forfeiture Notice
(18 U.S.C. § 1594(d))

Upon conviction for the offenses alleged in Count One, Two, or Three of this superseding indictment and pursuant to 18 U.S.C. § 1594(d), the defendants, **Curtis Vance Mathis, Kention Obryan Johnson, and Sergio Trinidad Carvajal**, shall forfeit to the United States any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation and any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violation.

A TRUE BILL:

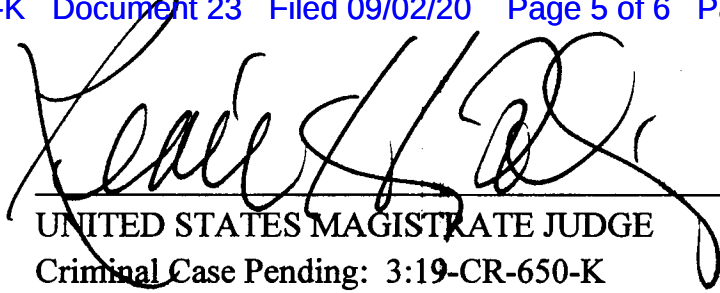


FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



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UNITED STATES MAGISTRATE JUDGE
Criminal Case Pending: 3:19-CR-650-K

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

CURTIS VANCE MATHIS (1)
KENTION OBRYAN JOHNSON (2)
SERGIO TRINIDAD CARVAJAL (3)

SUPERSEDING INDICTMENT

Sex Trafficking of Children
Violation of 18 U.S.C. § 1591(a)(1)
(Counts 1 and 2)

Conspiracy to Commit Sex Trafficking
18 U.S.C. § 1594(c) (18 U.S.C. § 1591(a)(1) and (a)(2)
(Count 3)

18 U.S.C. § 1594(d)
Forfeiture Notice

3 Counts

A true bill rendered

DALLAS



FOREPERSON

Filed in open court this 2 day of September, 2020.

Warrant to be Issued for DEFENDANTS KENTION OBRYAN JOHNSON
AND SERGIO TRINIDAD CARVAJAL
DEFENDANT CURTIS VANCE MATHIS IN FEDERAL CUSTODY SINCE
12/10/2019
